

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PEOPLE OF THE STATE OF
NEW YORK, by Letitia James,
Attorney General of the State of
New York,

Plaintiff,

v.

CITY OF NEW YORK, MAYOR
BILL DE BLASIO, POLICE
COMMISSIONER DERMOT F.
SHEA, and CHIEF OF
DEPARTMENT TERENCE A.
MONAHAN,

Defendants.

21-cv-322 (CM)(GWG)

**PLAINTIFF’S FIRST SUPPLEMENTAL SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Rule 26.3 of the Local Civil Rules of the United States District Court for the Southern and Eastern Districts of New York, plaintiff the People of the State of New York (“Plaintiff”) requests that defendants City of New York, Mayor Bill de Blasio, New York City Police Department (“NYPD”) Police Commissioner Dermot F. Shea, and Terence A. Monahan (“Defendants”), produce for examination, inspection and copying, within thirty (30) days of the service hereof, or such shorter time as the Court orders or that Plaintiff and Defendants (together, the “Parties”) stipulate, all documents described below at the New York State Office of the Attorney General, Civil Rights Bureau, 28 Liberty Street, 20th Floor, New York, New York 10005, or at such other place or time, or in such other manner, as the Parties mutually agree.

DEFINITIONS

1. Plaintiff incorporates by reference herein the Uniform Definitions in Discovery Requests set out in Rule 26.3(c) of the Local Civil Rules of the United States District Court for the Southern and Eastern Districts of New York (the “Local Civil Rules”).
2. “Arrest” means an Officer’s seizure, detention, or arrest of a person, including, but not limited to, for the purpose of issuing them a C-Summons (“summons”) or Desk Appearance Ticket (“DAT”) or fully processing them for arraignment.
3. “Complaint” means the Amended Complaint docketed at ECF No. 51.
4. “Date” means the exact day and time, month, and year if ascertainable, or if not, the best approximation (including relationship to other events).
5. “Defendants” include each and every defendant named in the Complaint.
6. “Document(s)” shall have the full meaning ascribed to it in Rule 34 of the Federal Rules of Civil Procedure and Local Civil Rule 26.3(c), and for purposes of these Requests shall be deemed to include “electronically stored information” (“ESI”) as also defined in Rule 34. Examples of documents include, but are not limited to, all writings in any form, calendars, correspondence, diaries, manuals, memoranda, notes, log entries, reports, records, drawings, graphs, charts, photographs, sound recordings, images, video recordings, telephone records, Bloomberts, FINEST messages, electronic mail messages, telephonic text messages (including SMS and MMS, iMessages, WhatsApp messages and all instant messages sent and received by whatever means or platform), spreadsheets, databases, all other forms of electronic communication, and other data or data compilations of whatever nature stored in any medium (including those from which information can be obtained or translated if necessary into a reasonably useable form). For the avoidance of doubt, document(s) shall include all originals of any nature

whatsoever and all non-identical copies thereof, whether different from the originals by reason of any notation made on such copies or otherwise.

7. “Kettling,” “kettling tactics” or “encirclement” means any and all plans, methods, procedures, tactics, strategies, or approaches, by whatever name or characterization, utilized by NYPD to control crowds, address disorderly conduct, and/or effectuate mass arrests and detentions, whether intentional or not, whereby Officers physically surround or otherwise contain members of the public within an area, leaving them few or no routes of egress without direct contact with Officers.
8. “Legal Observer” means an individual who attends a public demonstration to observe and document interactions between law enforcement and demonstrators.
9. “Officer” means a member of service of the NYPD, regardless of rank, including but not limited to any and all officers, detectives, sergeants, lieutenants, captains, chiefs, and/or deputy commissioners.
10. “Person” means any natural person, association, business, group, organization, legal entity, government entity, or other entity.
11. “Protests” means any and all protests, demonstrations, or gatherings at the Protest Locations identified on the **attached Schedule A** and/or referenced in the Complaint.
12. “Protest-Related Violation or Offense” means an alleged violation of any of the following laws during a demonstration or protest: New York State Vehicle and Traffic Law (“VTL”) Section 1156(a) (Pedestrians in Roadways); New York State Penal Law (“PL”) Section 240.05 (Riot in the Second Degree); PL Section 240.10 (Unlawful Assembly); PL Section 205.30 (Resisting Arrest); PL Section 195.05 (Obstruction of Governmental Administration in the Second Degree); PL Section 240.20(5) (Disorderly Conduct –

Blocking Vehicular or Pedestrian Traffic); PL Section 240.20(6) (Disorderly Conduct – Refusing to Obey a Lawful Dispersal Order); New York City Administrative Code (“NYAC”) Section 3-108 (Executive Order Violation); and NYAC Section 10-110(c) (Parading Without a Permit), and any other offenses with which any individual who participated in any Protest was actually Arrested and/or charged.

13. “Surveillance” means any activity undertaken to obtain information or evidence.

INSTRUCTIONS

1. In addition to following the rules of construction in Rule 26.3(d) of the Local Civil Rules, whenever necessary to bring within the scope of these Requests Documents that might otherwise be construed to be outside its scope: (a) the use of a verb in any tense shall be construed as the use of that verb in all other tenses; and (b) the use of the feminine, masculine, or neuter genders shall include all genders.
2. No paragraph herein shall be construed with reference to any other paragraph for the purpose of limitation.
3. Unless otherwise indicated, the relevant time period for purposes of these Requests is between January 1, 2018, and the present.
4. All Documents shall be produced in the manner in which they are maintained in the usual course of business. A request for a Document shall be deemed to include a request for any and all file folders or binders within which the Document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the Document in addition to the Document itself.
5. Any Request that calls for production of specific documents or forms where the information contained within such documents or forms is maintained in electronic databases or similar repositories, Plaintiff requests production of the underlying data in

lieu of the documents or forms themselves, unless the documents or forms contain additional or unique information, in which case the Request encompasses both the underlying data and the documents and forms.

6. Provide all ESI in the forms and manner specified in the Parties' agreed-upon production specifications.
7. In the event Defendants withhold any Document called for by these Requests on the basis of a claim of privilege, Defendants shall provide the information required by Rule 26.2 of the Local Civil Rules.
8. In the event that any Document called for by these Requests has been destroyed or discarded, Defendant shall provide an affidavit by a person with personal knowledge identifying the Document so lost, discarded, or destroyed as completely as possible, providing at least the following information: (i) the type of Document withheld; (ii) any author, addressor and/or addressee; (iii) any indicated or blind copy recipients; (iv) the Document's date, subject matter, number of pages, and attachments or appendices; (v) all persons to whom the Document was distributed, shown or explained; (vi) the Document's date of destruction or discard, manner of destruction or discard, and reason for destruction or discard; and (vii) the persons authorizing and carrying out such destruction or discard.
9. If objection is made to any of the Requests, the response shall state whether documents are being withheld from inspection and production on the basis of such objection, or whether inspection and production of the responsive Documents will occur notwithstanding such objection.

10. If there are no Documents responsive to any particular request, the response shall state so in writing.

11. These Requests are continuing in nature. In accordance with Rule 26(e) of the Federal Rules of Civil Procedure, Defendants are required promptly to serve supplementary responses and produce additional documents if Defendants obtain further or different information.

DOCUMENTS REQUESTED

Request No. 1:

Produce all documents relating to Jacqui Painter and Carlos Calzadilla-Palacio, and the incident that took place on May 29, 2020, at or near the vicinity of the 88th Precinct on Dekalb Avenue in Brooklyn, including, but not limited to, Threat, Resistance, or Injury (TRI) reports, summonses, hospital and other medical reports, body-worn camera footage, and any documents identifying Officers involved, including but not limited to the following: the police officer in a black or blue uniform and helmet in the screenshot attached as [Exhibit A](#), taken from the body-worn camera footage produced by Defendants as Def_CCRB_00019853.

Request No. 2:

Produce all documents relating to Luke Hanna and the incident that took place on June 3, 2020, at Cadman Plaza in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from 5:00 PM to 12:00 AM, within a two-block radius of the intersection between Tillary and Clinton Streets.

Request No. 3:

Produce all documents relating to Huascar Benoit and the incident that took place at a protest the night of May 30, 2020, and into the early morning hours of May 31, 2020, in the vicinity of Dekalb and Flatbush Avenues in Brooklyn, including, but not limited to, identifying the Officers

captured in the screenshots included in Exhibit B, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 5:00 PM the night of May 30, 2020, to 3:00 AM the morning of May 31, 2020, including but not limited to the following Officers:

- a. Reynaldo Gonzalez (923898 DTS, 84th Precinct);
- b. Oscar Palomino (942321 POM, 79th Precinct);
- c. Pavlo Azarov (953647 POM);
- d. Sali Cerimi (965974 POM, 83rd Precinct);
- e. Aaron Husbands (Shield # 4274, 79th Precinct); and
- f. Unnamed Officer with the helmet number that appears to be 13990 or a similar number).

Request No. 4:

Produce all documents relating to Joseph Kokesh and the incident that took place on May 29, 2020, near the intersection of Bergen Street and Fifth Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and body-worn camera footage taken by the following Officers:

- a. Joseph Giannantonio (956675 POM, 78th Precinct);
- b. Andrey Samusev (958047 POM, 78th Precinct); and
- c. Eduardo Silva (933356, Lieutenant, 78th Precinct).

Request No. 5:

Produce all documents relating to New York State Senator Zellnor Myrie and Assemblymember Diana Richardson, and the protests that took place on May 29, 2020, at Barclays Center in Brooklyn, including, but not limited to, documents identifying the Officer(s) who released

Senator Myrie from custody, TRI reports, summonses, hospital and other medical reports, and any body-worn camera footage taken by the following Officers:

- a. Eric Olfano (921639 SGT);
- b. Joseph Taylor (924542 CPT);
- c. John Loftus (935198 POM);
- d. Max Bermudez (944360 POM);
- e. Donald Weeks (946389);
- f. Ernan Vega (948153);
- g. Ronny Vega (951381);
- h. Marcin Steckiewicz (955529);
- i. Harry Kerr (962522 POM);
- j. Giovanni Calderon;
- k. Jessica Clinton, SRG3;
- l. Terence Monahan;
- m. Officer in the white shirt depicted in the image in [Exhibit C](#) and the Complaint (See para. 201); and
- n. All other officers depicted in [Exhibit C](#) or who were present at Barclay's Center on May 29, 2020.

Request No. 6:

Produce all documents identifying the Officers depicted in [Exhibit D](#) and the Complaint (See para. 169), who were present at the Mott Haven protests that took place on June 4, 2020, in Mott Haven.

Request No. 7:

Produce all documents relating to Rayne Valentine and the incident that took place on May 30, 2020, at or near the corner of Flatbush and Church Avenues in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any video footage, including body-worn camera footage from Officers involved in or present at the incident, including, but not limited to Officer Amjad Kasaji.

Request No. 8:

Produce all documents relating to Patricia Delfin and the incident that took place on May 29, 2020, in the Clinton Hill neighborhood in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from Officers involved in or present at the incident.

Request No. 9:

Produce all documents relating to Kerry Leigh Pittenger and the incident that took place on May 29, 2020, in the Bedford-Stuyvesant neighborhood in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from Officers involved in or present at the incident.

Request No. 10:

Produce all documents relating to Dorthley Beauval and the incident that took place on June 1, 2020, in the vicinity of West 56th Street and Broadway in Manhattan, including, but not limited to, TRI reports, hospital and other medical records, and any video footage relating to the alleged burglary of 1756 Broadway on June 1, 2020, and Beauval's arrest, such as body-worn camera footage from Officer Daniel Tooma and any other Officer involved in Beauval's arrest.

Request No. 11:

Produce all documents relating to Dennis Mullikin and the incident that took place on May 31, 2020, near 12th Street and Broadway in Manhattan, including, but not limited to, documents identifying Officers involved in Mullikin's arrest, TRI reports, aided reports, hospital and other medical records, and any video footage, including, but not limited to, body-worn camera footage from Officer Luis E. Ortiz (PO of the 138th Command) and other Officers in the vicinity between 8:00 PM and 11:00 PM on May 31, 2020.

Request No. 12:

Produce all documents relating to Hannah Lillevoy and the protest that took place on May 28, 2020, at Union Square in Manhattan, including, but not limited to, documents identifying Officers involved in the use of force against Lillevoy, TRI reports, summonses, hospital and other medical records, and any video footage, including, but not limited to, body-worn camera footage from Officers at and within a one-block radius of Union Square between 3:00 PM and 5:00 PM on May 28, 2020.

Request No. 13:

Produce all documents relating to Dounya Zayer and the incident that took place on May 29, 2020, on Pacific Street in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical records, and any video footage, including, but not limited to, body-worn camera footage from Officers in the two-block radius of Pacific Street and Flatbush Avenue between 7:00 PM and 9:00 PM on May 29, 2020.

Request No. 14:

Produce all documents relating to Alexandra Crousillat and the incident that took place on November 4, 2020, at or near Irving Place and East 14th Street—near Washington Square Park

and Union Square—in Manhattan, including, but not limited to, documents identifying Officers involved in Crousillat’s arrest, TRI reports, summonses, hospital and other medical records, and any video footage, from 8:00 PM to 11:00 PM, including, but not limited to, body-worn camera footage from Officer Chris Foley (of SRG-1), SRG Officer Wearing Helmet Number 644, any body-worn camera and other video footage associated with summons number 4443594647 issued by arresting officer Onabanjo, and all other Officers involved in the arrest of protesters at Union Square on November 4, 2020.

Request No. 15:

Produce the complete and up-to-date Civilian Complaint Review Board (CCRB) investigation file, including, but not limited to, Investigative Action forms, investigator interview summaries or reports, recordings of officer interviews, and all other related documents, filed by or regarding:

- a. Huascar Benoit (CCRB complaint No. 202003881);
- b. Hannah Lillevoy (CCRB complain No. 202003632);
- c. New York state Assembly Member Diana Richardson and Senator Zellnor Myrie (CCRB complaint No. 202003695);
- d. Dounya Zayer (CCRB complaint No. 202003692);
- e. Jacqueline Painter and Carlos Calzadilla-Palacio (CCRB complaint No. 202003698);
- f. Joseph Kokesh (CCRB complaint No. 202003770);
- g. Andrew Smith (CCRB complaint No. 202003703);
- h. Rayne Valentine (CCRB complaint No. 202004278);
- i. Carlos Polanco (CCRB complaint No. 202003773);
- j. Jason Donnelly (CCRB complaint No. 202003860);

- k. Brian Anderson (CCRB complaint No. 202003961);
- l. Zuleyka Morales (CCRB complaint No. 202003695);
- m. Melanie Ryan (CCRB complaint No. 202004307);
- n. Jemell Cole (CCRB complaint No. 202008262);
- o. Jillian Primiano (CCRB complaint No. 202005994);
- p. Brendan McDermid (CCRB complaint No. 202003901);
- q. Robert Bumsted and Anna Slatz (CCRB complaint No. 202003834);
- r. Tyler Berg (CCRB complaint No. 202003731); and
- s. David Siffert (CCRB complaint No. 202003712).

Request No. 16:

Produce the complete and up-to-date CCRB investigation file, including, but not limited to, Investigative Action forms, investigator interview summaries or reports, recordings of Officer interviews, and all other related documents, for the following protests and incidents:

- a. The May 30 and June 4 protests in East Flatbush involving NYPD Lieutenant Michael Butler (CCRB complaint Nos. 202003799, 202004204, 202003962);
- b. The May 30, 2020, incident in Flatbush involving NYPD Captain Vitaliy Zelikov (CCRB complaint No. 202004408);
- c. The CCRB investigations relating to the June 4 Mott Haven protest (CCRB complaint Nos. 202004055, 202004301, 202004402, 202006855); and
- d. The CCRB investigations relating to the May 29 Clinton Hill protest (CCRB complaint Nos. 202004179, 202003717).

Request No. 17:

Produce the complete and up-to-date Internal Affairs Bureau (IAB) investigation file, including, but not limited to, investigator interview summaries or reports, recordings of Officer interviews, and all other related documents, related to or involving the following:

- a. Huascar Benoit (Identified by IAB No. 20-14374);
- b. Hannah Lillevoy (Identified by IAB Nos. 20-10199, FI 2020-0479);
- c. New York state Assembly Member Diana Richardson and Senator Zellnor Myrie (Identified by IAB No. 20-13767);
- d. Dounya Zayer (Identified by IAB Nos. 20-0410, 20-13708, 20-14206);
- e. Jacqueline Painter and Carlos Calzadilla-Palacio (Identified by IAB Nos. 20-0410, 20-13708, and 20-14206);
- f. Joseph Kokesh (Identified by IAB Nos. FI-2020-000478, 2020-14196);
- g. Andrew Smith (Identified by IAB No. 20-13824);
- h. Rayne Valentine (Identified by IAB No. FI-2020-0430);
- i. Carlos Polanco (Identified by IAB Nos. FI-2020-000462; 2020-13963; 2020-22202);
- j. Dennis Mullikin (Identified by IAB Nos. 2020-000462, 2020-13963);
- k. Jason Donnelly (Identified by IAB No. 20-14108);
- l. Zuleyka Morales (Identified by IAB Nos. FI-2020-000535, 2020-15371);
- m. Lawrence Schober (Identified by IAB Nos. 21-10106 and 2021-09715);
- n. Melanie Ryan;
- o. Jemell Cole;
- p. Jillian Primiano;
- q. Brendan McDermid (Identified by IAB Nos. FI-2020-000489, 2020-14473);

- r. Robert Bumsted and Anna Slatz (Identified by IAB Nos. 2020-14809, OG-2020-007172);
- s. Tyler Berg;
- t. David Siffer; and
- u. Keith Boykin.

Request No. 18:

Produce the complete and up-to-date Internal Affairs Bureau (IAB) investigation file, including, but not limited to, investigator interview summaries or reports, recordings of Officer interviews, and all other related documents, relating to the following protests and incidents identified in the Complaint:

- a. The May 30, 2020, and June 4, 2020, incidents in the Brooklyn neighborhoods of Flatbush and Williamsburg, respectively, involving NYPD Lieutenant Michael Butler, including IAB Nos. 2020-17426 (F-2020-2794) and 2020-17377 (FI-2020-661);
- b. The May 30, 2020 incidents in Flatbush involving NYPD Captain Vitaliy Zelikov, including IAB No. 2020-14991;
- c. The June 4 Mott Haven protest; and
- d. The May 29 Clinton Hill protest.

Request No. 19:

Produce all documents, including any video footage, provided to any District Attorney's office investigating any incident at the protests for possible criminal charges, including, but not limited to, Rayne Valentine, Andrew Smith, and Dennis Mullikin.

Request No. 20:

Produce all documents concerning the creation of reports, records, communications, discussions, assessments, or critiques regarding the NYPD's deployment of officers to protests, including, but not limited to, orders, directives, instructions, and communications to create protest critiques reference by NYPD Captain Vitaliy Zelikov at his deposition on August 10, 2021.

Request No. 21:

Produce all 50-h hearing transcripts for all witnesses identified in the Complaint.

Request No. 22:

Produce all documents relating to Rob Goyanes and the incident that took place on June 4, 2020, in Mott Haven, at or near East 136th Street—between Brooke Avenue and Brown Place—including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 5:00 PM to 8:00 PM, including from SRG Officer Pecorella (badge number 9542), Officer Romero (badge number 6431), and Officer Blumenthal or Blumenberg (also referred to as “Blumie”) (badge number 1231).

Request No. 23:

Produce all documents relating to Michael Blau and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summonses number 4444104948.

Request No. 24:

Produce all documents relating to Aditi Bansal and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI

reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summonses number 4444110203.

Request No. 25:

Produce all documents relating to Holly Gunder and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4450085468.

Request No. 26:

Produce all documents relating to Katelyn Doyle and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, including from an Officer with badge number 4501.

Request No. 27:

Produce all documents relating to Tameer Peak, Benjamine Heath, Blaise Johnson, Hillary Wright, Jonathan Peck, Marissa Kaiser, Steve Mazzucchi, Vanessa Turi, and Ruvan Wijesooriya, and the incident that took place on January 18, 2021, at or near City Hall Park in Manhattan, including, but not limited to, TRI reports, summonses, arrest reports, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number M21601961 from arresting officer Morgante, tax ID # 958951.

Request No. 28:

Produce all documents relating to Bryan Fiedler and the incident that took place on June 4, 2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports,

summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444106078 issued by arresting officer Luis Negron, tax ID # 968665.

Request No. 29:

Produce all documents relating to Kayley Berezney and the incident that took place on June 4, 2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444106064 issued by arresting officer Luis Negron, tax ID # 968665.

Request No. 30:

Produce all documents relating to Marie Kahn and the incident that took place on June 4, 2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444105938 issued by arresting officer Husbands.

Request No. 31:

Produce all documents relating to Abel Tirado and the incident that took place on November 4, 2020, at or near Seventh Avenue South and Leroy Street in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number M20629727 issued by arresting officer Hurchey.

Request No. 32:

Produce all documents relating to Dr. Michael Pappas and the incident that took place on June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in Pappas's arrest, including the Officers who observed Pappas and the arresting officers associated with summons number 4443829723, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4443829723, including, but not limited to, body-worn camera footage from any involved officers.

Request No. 33:

Produce all documents relating to Jillian Primiano and the incident that took place on June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in Primiano's arrest, including the Officers who observed Primiano and the arresting officers associated with summons number 4448281113, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4448281113, including, but not limited to, body-worn camera footage from any involved officers, including but not limited to Brian Destefano.

Request No. 34:

Produce all documents relating to Marie DeLuca and the incident that took place on June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in DeLuca's arrest resulting in summons number 4448373565, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4448373565, including, but not limited to, body-worn camera footage from any involved officers, including but not limited to Crystal Washington.

Request No. 35:

Produce all documents relating to Zuleyka Morales and the incident that took place on June 2, 2020, on the West Side Highway in Manhattan (Protest No. 39 in Schedule A), including, but not limited to, documents identifying Officers involved in Morales's arrest resulting in summons number 4441347880, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 444134788, including, but not limited to, body-worn camera footage from the arresting officer, from Patrick Connolly, and from any other Officers involved in the arrest of Morales.

Request No. 36:

Produce all documents relating to Keith Boykin and the incident that took place on May 30, 2020, on the West Side Highway at West 96th Street in Manhattan (Protest No. 9 in Schedule A), including, but not limited to, documents identifying Officers involved in Boykin's arrest resulting in summons numbers 4443977943 and 4443977930, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with Boykin's arrest, including, but not limited to, body-worn camera footage from the arresting officer, and from any other Officers involved in the arrest of Boykin.

Request No. 37:

Produce all documents relating to Jemell Cole and the incident that took place on July 15, 2020, on the Brooklyn Bridge pedestrian path resulting in the arrest of Jemell Cole (voided arrest No. M20620174; Protest No. 67 in Schedule A), including, but not limited to, documents identifying Officers involved in Cole's arrest, TRI reports, hospital and other medical reports, body-worn camera footage, ARGUS footage, and all other video footage associated with Cole's arrest.

Request No. 38:

Produce all documents concerning any information known to the NYPD before or during the following protests concerning illegal conduct, or the possibility thereof, at such location, warranting the use of encirclement or kettling tactics:

- a. June 2, 2020 – Manhattan Bridge;
- b. June 3, 2020 – Cadman Plaza; and Midtown Manhattan, near East 54th Street and Third Avenue;
- c. June 4, 2020 – South Williamsburg, near Penn Street and Wythe Avenue;
- d. November 4, 2020 – Washington Square Park, in the vicinity of West 8th Street, between Fifth and Sixth Avenues; and Union Square, near East 14th Street and Fourth Avenue; and
- e. January 18, 2021 – MLK day protest near City Hall Park in Manhattan.

Request No. 39

Produce all documents relating to Carlos Polanco and the incident that took place on May 30, 2020 on the F.D.R. Drive in Manhattan including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from the following:

- a. The Officer in Exhibit E holding the baton in his right hand and spraying OC spray in his left hand;
- b. Any other officers identified in Exhibit E;
- c. Sgt. Majer Saleh (Tax ID number 929110).

Request No. 40:

Produce all documents relating to Laisa Pertet and the incident that took place on the night of May 30, 2020, near the Flatbush Extension in Brooklyn including, but not limited to, TRI

reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage.

Request No. 41:

Produce all documents relating to Alan Williams and the incident that took place on the evening of May 29, 2020, at or near the Barclay's Center in Brooklyn, near the metal barricades separating protesters and NYPD officers, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage.

Request No. 42:

Produce all documents relating to Andrew Smith and the incident that took place in the early evening of May 30, 2020, at or near the intersection of Bedford and Tilden Avenues in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, including from, but not limited to, Officer Michael Sher.

Request No. 43:

Produce all documents relating to the use of force against Lawrence Schober that took place on May 31, 2020, in the vicinity of Broadway and 11th Street in Manhattan, including, but not limited to, documents identifying Officers involved in Schober's arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with the use of force by Officers against Schober.

Request No. 44:

Produce all documents relating to the arrest of Brian Anderson (Arrest ID K20619401) and the incident that took place on May 29, 2020, in the vicinity of the 79th Precinct stationhouse, at 263 Tompkins Avenue in Brooklyn, and Herbert von King Park, (Protest No. 6 in Schedule A),

including, but not limited to, documents identifying Officers involved in Anderson's arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with Anderson's arrest, including from Officer Mohamed Elhanafi (TAX ID 955897).

Request No. 45:

Produce all documents relating to Jason ("Jae") Donnelly and the incident that took place on June 2, 2020, in the vicinity of West 53rd Street and 9th Avenue in Manhattan (Protest No. 36 in Schedule A), including, but not limited to, documents identifying Officers involved in the use of force against Donnelly, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with Donnelly, including from Sgt. William Balunas.

Request No. 46:

Produce all documents relating to the arrest of Melanie Ryan (Summons number 4449869464) and the incident that took place on June 3, 2020, in the vicinity of East 50th Street and Third Avenue in Manhattan, including, but not limited to, documents identifying Officers involved in Ryan's arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with Ryan's arrest, including from Officer Jeff of SRG 3.

Dated: December 22, 2021

/s/ Travis W. England

Jessica Clarke

Chief of Civil Rights Bureau

Travis England, *Deputy Bureau Chief*

Lillian Marquez, *Assistant Attorney General*

Swati Prakash, *Assistant Attorney General*

Gregory Morril, *Assistant Attorney General*

Conor Duffy, *Assistant Attorney General*

Colleen Faherty, *Assistant Attorney General*

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Schedule A: List of Protest Locations¹

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
1	May 28, 2020	Lafayette Street to City Hall, Manhattan	<i>People</i> , ¶ 51 <i>Sow</i> , ¶ 65
2	May 28, 2020	Union Square, Manhattan	<i>People</i> , ¶¶ 128-132 <i>Payne</i> , ¶ 44 <i>Sow</i> , ¶ 65
3	May 29, 2020	Foley Square Manhattan to Near Barclays Center, Brooklyn via Brooklyn Bridge	<i>People</i> , ¶¶ 52, 193-195, 196-202 <i>Payne</i> , ¶ 45 <i>Sow</i> , ¶ 65 <i>Wood</i> , ¶¶ 45-47
4	May 29, 2020	Clinton Hill, Brooklyn	<i>People</i> , ¶¶ 52, 133-140, 223-226
5	May 29, 2020	Fort Greene, Brooklyn	<i>People</i> , ¶ 52
6	May 29, 2020	Bedford-Stuyvesant, Brooklyn (Herbert von King Park), Brooklyn	<i>People</i> , ¶¶ 141-149, 161-163
7	May 29, 2020	Pacific Street and Flatbush Avenue, Brooklyn	<i>People</i> , ¶¶ 215-219 <i>Wood</i> , ¶¶ 48-50
8	May 29, 2020	Union Square, Manhattan	<i>People</i> , ¶ 52
9	May 29, 2020	Herald Square, Manhattan	<i>People</i> , ¶ 52
10	May 30, 2020	Jackson Heights, Queens	<i>People</i> , ¶ 53
11	May 30, 2020	Park Slope, Brooklyn	<i>People</i> , ¶ 53
12	May 30, 2020	East Flatbush, Brooklyn	<i>People</i> , ¶¶ 53, 312-317 <i>Sow</i> , ¶ 67
13	May 30, 2020	Near Bedford & Tilden Aves., Brooklyn	<i>People</i> , ¶¶ 178-192, 235-236
14	May 30-31, 2020	Barclays Center to Flatbush Extension, Brooklyn	<i>People</i> , ¶¶ 203-207, 107-114 <i>Payne</i> , ¶¶ 47-48, 107-115
15	May 30, 2020	Harlem / West Side Highway, Manhattan	<i>People</i> , ¶¶ 402-407
16	May 30, 2020	Union Square to FDR Drive/Lower East Side, Manhattan	<i>Payne</i> , ¶¶ 50, 117-123 <i>Sow</i> , ¶¶ 130-151
17	May 30, 2020	City Hall to Brooklyn Bridge, Manhattan	<i>Sow</i> , ¶¶ 152-177
18	May 31, 2020	Near Barclays Center, Brooklyn	<i>People</i> , ¶ 54 <i>Sow</i> , ¶ 68

¹ The allegations listed in this table reference those in the Amended Complaints in *People*, No. 21 Civ. 322 (ECF No. 51), *Payne*, No. 20 Civ. 8224 (ECF No. 54), *Sierra*, No. 20 Civ. 10291 (ECF No. 38), *Sow*, 21 Civ. 533 (ECF No. 49) and *Wood*, 20 Civ. 10541 (ECF No. 48) and the Complaint in *Yates*, No. 21 Civ. 1904 (ECF No. 1).

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
19	May 31, 2020	Downtown Brooklyn to multiple bridges	<i>People</i> , ¶ 54
20	May 31, 2020	Brooklyn Bridge	<i>People</i> , ¶ 54
21	May 31, 2020	From Manhattan Bridge to Chinatown, Church Street, and/or across Canal Street, Manhattan	<i>People</i> , ¶ 54 <i>Yates</i> , ¶¶ 13-21 <i>Wood</i> , ¶¶ 51-54
22	May 31, 2020	Near Williamsburg Bridge, Manhattan	<i>People</i> , ¶ 54
23	May 31, 2020	Broadway to E. 11 th St. & Near Union Square, Manhattan	<i>People</i> , ¶¶ 155-160, 231-234 <i>Payne</i> , ¶¶ 125-130
24	May 31, 2020	Times Square, Manhattan	<i>People</i> , ¶ 54
25	May 31, 2020	F.D.R. Drive, Manhattan	<i>People</i> , ¶¶ 208-210
26	June 1, 2020	Midtown, Manhattan	<i>People</i> , ¶¶ 55, 227-230 <i>Payne</i> , ¶ 53 <i>Sow</i> , ¶¶ 208-219
27	June 1, 2020	East Village, Manhattan	<i>People</i> , ¶ 55
28	June 1, 2020	Near Union Square Park, Manhattan	<i>People</i> , ¶ 55 <i>Payne</i> , ¶ 53
29	June 1, 2020	Near Barclays Center, Brooklyn, Crossing Manhattan Bridge into Times Square & Near Port Authority, Manhattan	<i>People</i> , ¶ 55 <i>Sow</i> , ¶¶ 180-206
30	June 1, 2020	Fordham Manor, Bronx	<i>People</i> , ¶ 55
31	June 1, 2020	Astoria Park, Queens	<i>People</i> , ¶ 55
32	June 1, 2020	Flushing, Queens	<i>People</i> , ¶ 55
33	June 2, 2020	Lower Manhattan/Foley Square to Central Park, Manhattan	<i>People</i> , ¶¶ 56, 318-323 <i>Payne</i> , ¶¶ 131-136
34	June 2, 2020	Union Square, Manhattan	<i>People</i> , ¶¶ 56
35	June 2, 2020	Near Barclays Center, Brooklyn to Manhattan Bridge	<i>People</i> , ¶¶ 330-336
36	June 2, 2020	Upper West Side, Manhattan	<i>People</i> , ¶¶ 56, 423-430
37	June 2, 2020	Astor Place, Manhattan	<i>People</i> , ¶ 56
38	June 2, 2020	Chelsea, Manhattan	<i>People</i> , ¶ 56 <i>Payne</i> , ¶ 54
39	June 2, 2020	Near West Side Highway, Manhattan	<i>Payne</i> , ¶ 54 <i>Sow</i> , ¶¶ 220-237, 239-282
40	June 2, 2020	Bryant Park to Midtown, Manhattan	<i>People</i> , ¶ 57 <i>Wood</i> , ¶¶ 55-59
41	June 3, 2020	Cadman Plaza, Brooklyn	<i>People</i> , ¶¶ 57, 164-168, 337-346 <i>Payne</i> , ¶¶ 55, 143-159

<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
			<i>Sow</i> , ¶ 83 <i>Wood</i> , ¶¶ 65-66
42	June 3, 2020	Maria Hernandez Park, Brooklyn	<i>People</i> , ¶ 57
43	June 3, 2020	Midtown East/Upper East Side, Manhattan	<i>People</i> , ¶¶ 57, 237-246, 347-354 <i>Sow</i> , ¶ 84-85, 284-309 <i>Wood</i> , ¶¶ 60-64
44	June 4, 2020	Mott Haven, Bronx	<i>People</i> , ¶¶ 58, 169-170, 247-255, 284-310, 366-387 <i>Wood</i> , ¶¶ 116-167 <i>Payne</i> , ¶¶ 59-65, 161-173, 182-192, 194-200 <i>Sierra</i> , ¶¶ 41-124 <i>Sow</i> , ¶¶ 86-93, 310-329, 332-345, 348-390, 392-418
45	June 4, 2020	McCarren Park to South Williamsburg, Brooklyn	<i>People</i> , ¶¶ 355-365 <i>Payne</i> , ¶¶ 58, 202-206 <i>Wood</i> , ¶¶ 67-68 <i>Sow</i> , ¶ 84-85
46	June 4, 2020	Clinton Hill and Prospect Heights, Brooklyn	<i>People</i> , ¶ 59
47	June 4, 2020	Flatbush, Brooklyn	<i>People</i> , ¶ 59
48	June 4, 2020	Brooklyn Bridge	<i>People</i> , ¶ 59
49	June 4, 2020	Midtown, Manhattan	<i>People</i> , ¶ 59
50	June 4, 2020	Flushing, Queens	<i>People</i> , ¶ 59
51	June 4, 2020	Central Park West, Manhattan	<i>People</i> , ¶ 59
52	June 5, 2020	Crown Heights, Brooklyn	<i>People</i> , ¶ 60
53	June 5, 2020	Sunset Park, Brooklyn	<i>People</i> , ¶ 60
54	June 5, 2020	Staten Island	<i>People</i> , ¶ 60
55	June 5, 2020	Near Gracie Mansion, Manhattan	<i>People</i> , ¶ 60
56	June 5, 2020	Barclays Center to Downtown Brooklyn	<i>People</i> , ¶ 60
57	June 5, 2020	Nostrand Ave., Brooklyn	<i>Payne</i> , ¶ 71
58	June 6, 2020	Financial District, Manhattan	<i>People</i> , ¶ 61
59	June 7, 2020	Upper East Side, Manhattan	<i>People</i> , ¶ 61
60	June 8, 2020	Times Square, Manhattan	<i>People</i> , ¶ 61
61	June 14, 2020	Times Square, Manhattan	<i>Payne</i> , ¶ 74
62	June 28, 2020	Foley Square to West Village, Manhattan (incl. Washington Square Park)	<i>People</i> , ¶ 62 <i>Payne</i> , ¶¶ 78, 174-180, 209-210
63	June 23-30, 2020	City Hall Park, Manhattan	<i>Payne</i> , ¶ 74

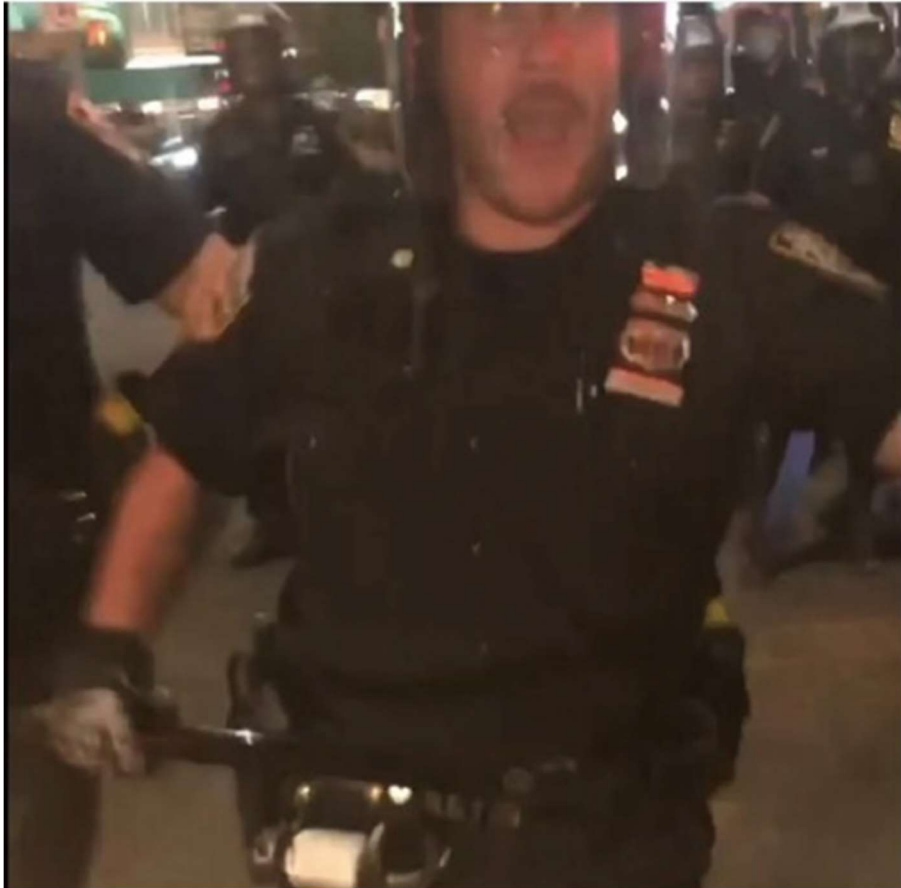
<u>Protest No.</u>	<u>Date</u>	<u>Approximate Location</u>	<u>Complaint Allegations</u>
64	July 3, 2020	City Hall Park, Manhattan	<i>People</i> , ¶ 63
65	July 11, 2020	Dyker Heights, Brooklyn	<i>Sow</i> , ¶ 101
66	July 12, 2020	Bay Ridge, Brooklyn	<i>Sow</i> , ¶ 102
67	July 15, 2020	Brooklyn Bridge Pedestrian Path	<i>People</i> , ¶¶ 408-421
68	July 28, 2020	Kips Bay, Manhattan	<i>People</i> , ¶ 64
69	September 11, 2020	McCarren Park, Brooklyn	<i>People</i> , ¶ 65
70	September 17, 2020	Foley Square, Manhattan	<i>Payne</i> , ¶ 76
71	September 19, 2020	Times Square, Manhattan	<i>Payne</i> , ¶ 77
72	September 26, 2020	Washington Square Park and Near Sixth Precinct Stationhouse, Manhattan	<i>People</i> , ¶ 66
73	October 6, 2020	Borough Park, Brooklyn	<i>Sow</i> , ¶ 103
74	October 7, 2020	Bedford-Stuyvesant, Brooklyn	<i>People</i> , ¶ 67
75	October 25, 2020	Coney Island, Brooklyn to near Trump Tower, Manhattan, to Brooklyn Park	<i>Sow</i> , ¶ 104
76	November 1, 2020	Hell's Kitchen, Manhattan	<i>Sow</i> , ¶ 105
77	November 4, 2020	Washington Square Park, W. 8 th and Greenwich Ave., Manhattan	<i>People</i> , ¶¶ 68, 388-389
78	November 4, 2020	Central Park to Union Square, Manhattan	<i>People</i> , ¶ 68, 390-393 <i>Payne</i> , ¶ 78
79	November 5, 2020	West Village to Union Square, Manhattan	<i>People</i> , ¶ 69 <i>Payne</i> , ¶ 79
80	December 2, 2020	Staten Island	<i>Sow</i> , ¶ 106
81	December 11, 2020	Downtown Brooklyn	<i>People</i> , ¶ 70
82	January 12-16, 2021	Downtown Brooklyn	<i>Payne</i> , ¶ 138
83	January 18, 2021	Barclays Center, Brooklyn to City Hall Park, Manhattan	<i>People</i> , ¶¶ 71, 112-113 394-398 <i>Payne</i> , ¶¶ 80, 139-140

Exhibit A

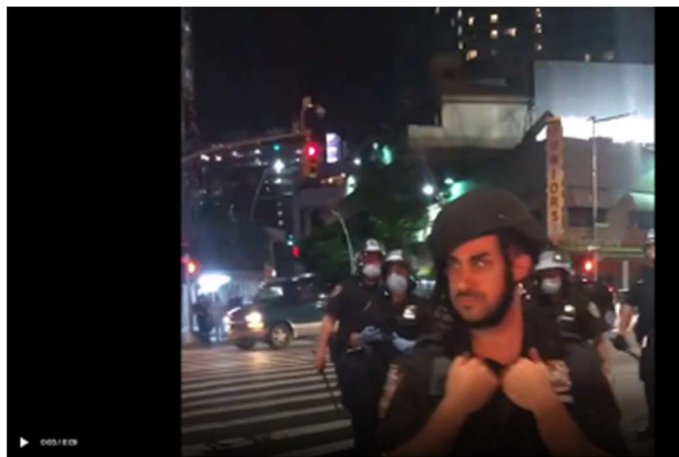


Exhibit B

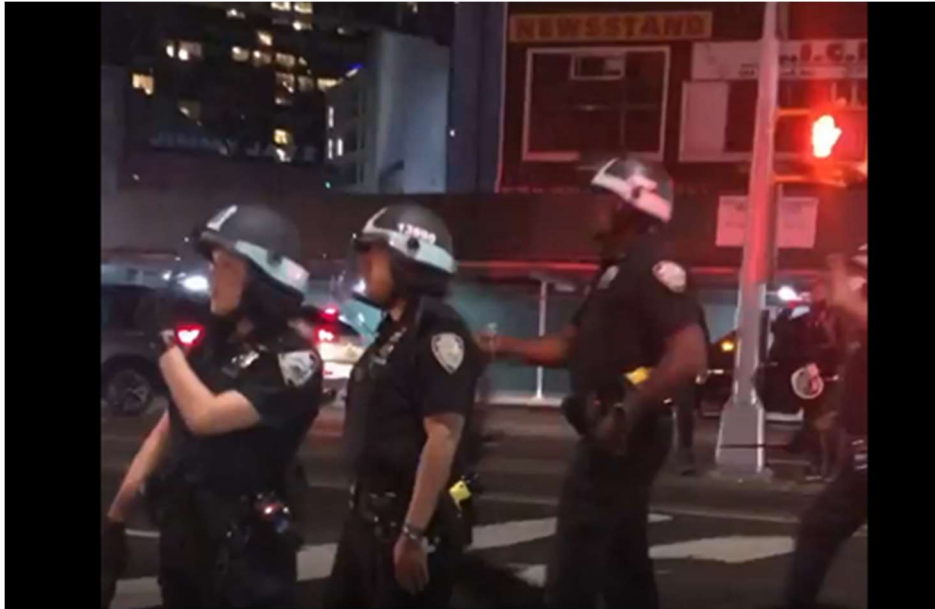
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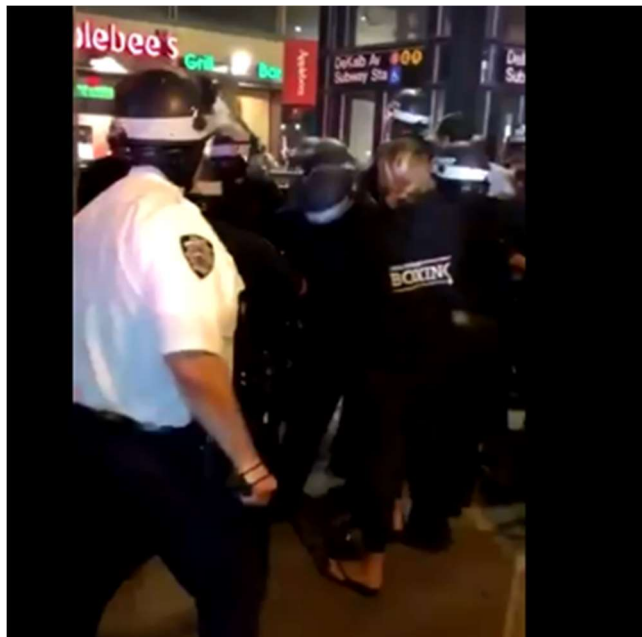
b.



c.



d.



e.



f.

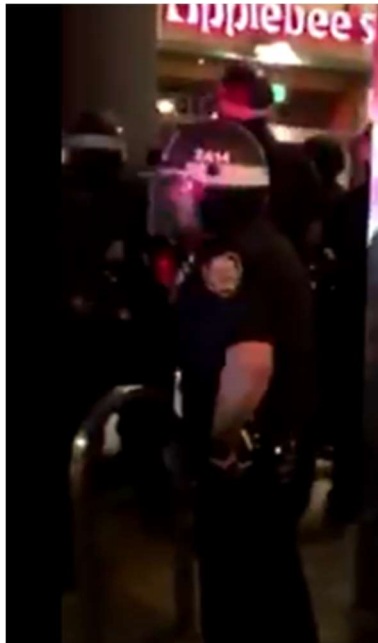


Exhibit C



Exhibit D

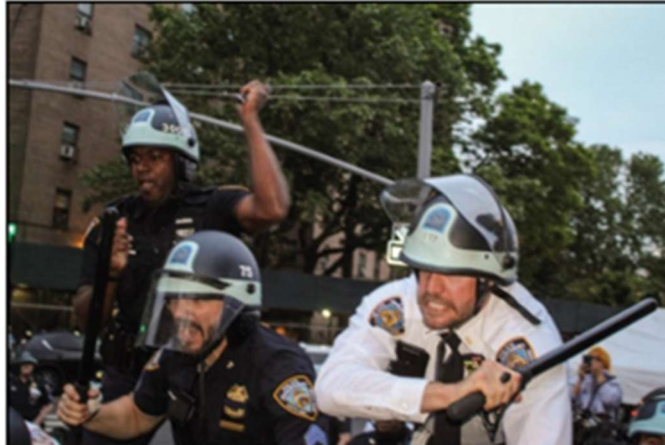


EXHIBIT E

